

**In the United States District Court
Eastern District of Arkansas
Western Division**

DAREL ADELSBERGER; AND
ANNETTE ADELSBERGER

PLAINTIFFS

v.

No. 4:19-cv-003-SWW

UNION PACIFIC RAILROAD COMPANY

DEFENDANT

Joint Motion for Entry of Agreed Protective Order

The parties jointly move the Court to enter the proposed protective order attached as EXHIBIT 1, and in support state:

1. To address any issues involving confidential information in this case, the parties have agreed to the terms of a protective order.
2. Their agreed proposed order is attached as EXHIBIT 1.
3. The parties feel that the proposed order strikes an appropriate balance between protecting what needs protecting, and disclosing what should be public.

Accordingly, the parties jointly move the Court to enter the agreed proposed protective order attached as EXHIBIT 1.

Respectfully submitted,

Joseph P. McKay (99006)
Joshua C. Ashley (2012051)
FRIDAY, ELDREDGE & CLARK, LLP
400 W. Capitol Ave., Ste. 2000
Little Rock, Ark. 72201
501.376.2011 – *phone*
501.376.2147 – *fax*
jmckay@fridayfirm.com
jashley@fridayfirm.com

Counsel for Union Pacific

&

Stanley D. Rauls (79237)
P.O. Box 21665
Little Rock, Ark.
501.227.8999 – *phone*
sdr@aristotle.net

Counsel for the Adelsbergers